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T.R.A. DOCKET ROOM
November 6, 2003

VIA HAND DELIVERY

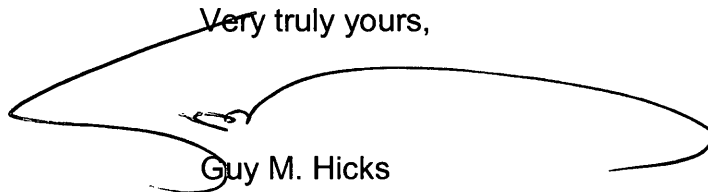
Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's
Triennial Review Order (Nine-month Proceeding)(Switching)*
Docket No. 03-00491

Dear Chairman Tate:

Enclosed are the original and fourteen copies of BellSouth's General and Specific Objections to CompSouth's First Set of Interrogatories. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In Re: *Implementation of the Federal Communications Commission's
Triennial Review Order (Nine-month Proceeding)(Switching)*

Docket No. 03-00491

**BELLSOUTH TELECOMMUNICATIONS, INC.'S (GENERAL AND SPECIFIC)
OBJECTIONS TO THE COMPETITIVE CARRIERS OF THE SOUTH, INC.'S
FIRST SET OF INTERROGATORIES NOS. 1-18**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files the following General and Specific Objections to the Competitive Carriers of the South, Inc. ("CompSouth") First Set of Interrogatories Nos. 1-18, dated October 27, 2003.

The objections stated herein are preliminary in nature. Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced interrogatories and request for production of documents, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

1. BellSouth objects to each and every interrogatory to the extent that such request may call for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

2. BellSouth objects to each and every interrogatory insofar as the interrogatories are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories and requests for production. Any answers

provided by BellSouth in response to the interrogatories and requests for production will be provided subject to, and without waiver of, the foregoing objection.

3. BellSouth objects to each and every interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

4. BellSouth objects to providing information to the extent that such information is already in the public record before the Authority.

5. BellSouth objects to CompSouth's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Tennessee Rules of Civil Procedure or Tennessee Law.

6. BellSouth objects to each and every interrogatory insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

7. BellSouth is a large corporation with employees located in many different locations in Tennessee and in other states. In the course of its business, BellSouth creates countless documents that are not subject to state commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search

of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

8. BellSouth objects to each and every interrogatory and request for production to the extent that the information requested constitutes "trade secrets" or that would require the disclosure of customer specific information. To the extent that CompSouth requests proprietary confidential business information, BellSouth will make such information available in accordance with the parties' protective agreement and the Protective Order to be entered in this proceeding, subject to any other general or specific objections contained herein.

9. To the extent that such requests are overly broad and unduly burdensome, BellSouth objects to any discovery request that seeks to obtain "all" of particular documents, items, or information. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

10. BellSouth objects to the manner in which certain discovery is requested. BellSouth may not maintain information in the ordinary course of its business in the particular format requested by CompSouth. BellSouth objects to providing responsive information in the format requested by the CompSouth on the grounds that doing so would be overly broad, unduly burdensome, and oppressive.

SPECIFIC OBJECTIONS

Interrogatory No. 7

Provide the number of EELs in service at the end of the most recent quarter for which such information is available, stated separately for:

- a. EELs comprised of analog loops that are connected to analog transport;
- b. EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport;
- c. EELs comprised of DS-1 loops that are connected to DS-1 transport;
- d. EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport.

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 59). BellSouth intends to direct CompSouth to its response (and objections, if applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Interrogatory No. 8

For the last quarter for which such information is available, provide by end-office (by applicable CLLI code):

- a. The CLLI of the tandem switch on which the end-office homes;
- b. For the same period as the information provided in the 8(b), please indicate whether you have enough end office and tandem switch ports available for each wire center to handle the traffic if all UNE-P lines were moved to CLEC switches.

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 60). BellSouth intends to direct CompSouth to its response (and objections, if applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Interrogatory No. 9

Provide the number of EEL local connections, in DS-1 equivalents, by BellSouth wire center for each quarter since the fourth quarter of 1999.

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 61). BellSouth intends to direct CompSouth to its response (and objections, if applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Interrogatory No. 11

For the last quarter for which such information is available, provide by end-office (by applicable CLLI code):

- a. The CLLI of the tandem switch on which the end-office homes;
- b. The number of shared transport (i.e., transport used in conjunction with the unbundled local switching) minutes originating from the end-office;
- c. The number of shared transport minutes terminating to the end-office.

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 63). BellSouth intends to direct CompSouth to its response (and objections, if applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Interrogatory No. 12

For the same period as the information provided in the previous question, please provide:

- a. The total number of interconnection trunks and interconnection minutes at each tandem, separated between:
 - i. Originating trunks and the minutes carried by those trunks;
 - ii. Terminating trunks and the minutes carried by those trunks;

- iii. Two-way trunks and the minutes carried by those trunks.
- b. The total number of interconnection trunks and interconnection minutes at each end-office (by applicable CLLI code), separated between:
 - i. Originating trunks and the minutes carried by those trunks;
 - ii. Terminating trunks and the minutes carried by those trunks;
 - iii. Two-way trunks and the minutes carried by those trunks.
- c. The number of additional trunk terminations available on each tandem;
- d. The number of additional trunk terminations available on each end-office.

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 64). BellSouth intends to direct CompSouth to its response (and objections, if applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Interrogatory No. 13

Provide the number of loops, by calendar year and by central office (by applicable CLLI code), that are served by:

- a. IDLC arrangements;
- b. NGDLC arrangements;
- c. UDLC arrangements;
- d. Of the IDLC loops, please state how many loops are transferable to universal digital loop carrier (UDLC) without additional construction.

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 65). BellSouth intends to direct CompSouth to its response (and objections, if

applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Interrogatory No. 14

Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops that you intend to serve via:

- a. IDLC loop arrangements;
- b. NGDLC loop arrangements;

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 66). BellSouth intends to direct CompSouth to its response (and objections, if applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Interrogatory No. 15

Provide the number, for the most recent time period for which data is available, of UNE loops served by IDLC and NGDLC arrangements that have been provided to a CLEC:

- a. With unbundled local switching;
- b. Without unbundled local switching.

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 67). BellSouth intends to direct CompSouth to its response (and objections, if applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Interrogatory No. 17

During the past 5 years, has BellSouth ever added processor capacity or peripheral equipment to one or more of its local switches due to;

- a. Increased usage;

- b. Exhaust of the number of end-user lines that could be connected to the switch.

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 70). BellSouth intends to direct CompSouth to its response (and objections, if applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Interrogatory No. 18

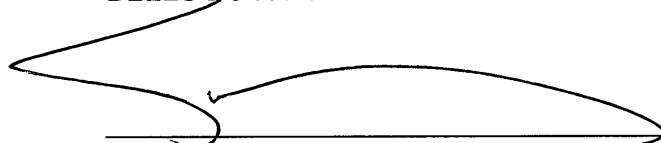
If the answer to either part of the previous question above is yes, please identify:

- a. The nature of the upgrade performed;
- b. Whether BellSouth had other end-office switches within a 15-mile radius with capacity to handle additional lines;
- c. If the answer to b. is yes, whether BellSouth considered off-loading subscriber lines from the switch requiring the upgrade, and serving those lines from a different local switch. If BellSouth did not consider doing so, why not?

Objection: This Interrogatory is identical to a request from AT&T (Interrogatory No. 71). BellSouth intends to direct CompSouth to its response (and objections, if applicable) to AT&T's Interrogatory in lieu of responding to the identical question from CompSouth, which would be unduly burdensome.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A large, stylized handwritten signature in black ink, appearing to read 'Guy M. Hicks', is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2003, a copy of the foregoing document was served on the parties of record, via the method indicated:

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☐ Overnight
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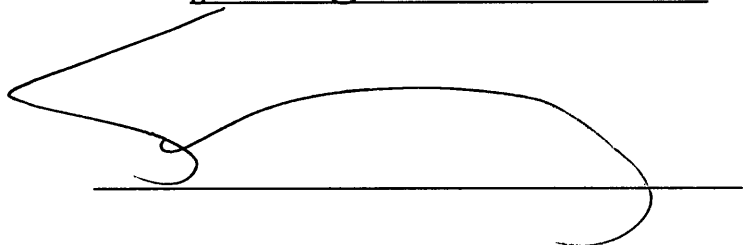
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A large, stylized handwritten signature in black ink, written over a horizontal line. The signature is cursive and appears to be 'G Thornton'.